

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN DIVISION**

**United States District Court  
Southern District Of Texas  
FILED**

**FEB 11 2020**

**David J. Bradley, Clerk**

**UNITED STATES OF AMERICA**

**v.**

**SERGIO SOSA**

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§

**Criminal No.**

**M-20-0361**

**SEALED INDICTMENT**

**THE GRAND JURY CHARGES:**

**Count One**

From on or about July 5, 2017 through on or about February 1, 2018, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**SERGIO SOSA**

did knowingly and for the purpose of evading the reporting requirements of Section 5331 of Title 31, United States Code, and the regulations prescribed thereunder, did cause and attempt to cause Keystone Construction, a nonfinancial trade or business to fail to file a report required under the aforementioned statute and any regulation prescribed under any such section in connection with a transaction involving Villas San Gabriel Lot 32 and as part of a pattern of illegal activity involving more than \$100,000 in a 12-month period.

In violation of Title 31, United States Code, Sections 5324(b)(1) and 5324(d); Title 31, Code of Federal Regulations, Section 1010.330; and Title 18, United States Code, Section 2.

**Count Two**

From on or about July 5, 2017 through on or about February 1, 2018, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**SERGIO SOSA**

did knowingly and for the purpose of evading the reporting requirements of Section 5331 of Title 31, United States Code, and the regulations prescribed thereunder, did structure, assist in structuring, and attempt to structure and assist in structuring, a transaction with Keystone Construction, a nonfinancial trade or business, involving Villas San Gabriel Lot 32 and as part of a pattern of illegal activity involving more than \$100,000 in a 12-month period.

In violation of Title 31, United States Code, Sections 5324(b)(3) and 5324(d); Title 31, Code of Federal Regulations, Section 1010.330; and Title 18, United States Code, Section 2.

**Count Three**

From on or about July 5, 2017 through on or about February 1, 2018, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**SERGIO SOSA**

did knowingly and for the purpose of evading the reporting requirements of Section 5331 of Title 31, United States Code, and the regulations prescribed thereunder, did cause and attempt to cause Keystone Construction, a nonfinancial trade or business to fail to file a report required under the aforementioned statute and any regulation prescribed under any such section in connection with a transaction involving Villas San Gabriel Lot 40 and as part of a pattern of illegal activity involving more than \$100,000 in a 12-month period.

In violation of Title 31, United States Code, Sections 5324(b)(1) and 5324(d); Title 31, Code of Federal Regulations, Section 1010.330; and Title 18, United States Code, Section 2.

**Count Four**

From on or about July 5, 2017 through on or about February 1, 2018, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**SERGIO SOSA**

did knowingly and for the purpose of evading the reporting requirements of Section 5331 of Title 31, United States Code, and the regulations prescribed thereunder, did structure, assist in structuring, and attempt to structure and assist in structuring, a transaction with Keystone Construction, a nonfinancial trade or business, involving Villas San Gabriel Lot 40 and as part of a pattern of illegal activity involving more than \$100,000 in a 12-month period.

In violation of Title 31, United States Code, Sections 5324(b)(3) and 5324(d); Title 31, Code of Federal Regulations, Section 1010.330; and Title 18, United States Code, Section 2.

**Count Five**

From on or about August 13, 2019 through at least February 6, 2020, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**SERGIO SOSA**

did knowingly and for the purpose of evading the reporting requirements of Section 5331 of Title 31, United States Code, and the regulations prescribed thereunder, did cause and attempt to cause Keystone Construction, a nonfinancial trade or business to fail to file a report required under the aforementioned statute and any regulation prescribed under any such section in connection with a transaction involving Silver Creek Estates Lot 64 and as part of a pattern of illegal activity involving more than \$100,000 in a 12-month period.

In violation of Title 31, United States Code, Sections 5324(b)(1) and 5324(d); Title 31, Code of Federal Regulations, Section 1010.330; and Title 18, United States Code, Section 2.

**Count Six**

From on or about August 13, 2019 through at least February 6, 2020, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**SERGIO SOSA**

did knowingly and for the purpose of evading the reporting requirements of Section 5331 of Title 31, United States Code, and the regulations prescribed thereunder, did structure, assist in structuring, and attempt to structure and assist in structuring, a transaction with Keystone Construction, a nonfinancial trade or business, involving Silver Creek Estates Lot 64 and as part of a pattern of illegal activity involving more than \$100,000 in a 12-month period.

In violation of Title 31, United States Code, Sections 5324(b)(3) and 5324(d); Title 31, Code of Federal Regulations, Section 1010.330; and Title 18, United States Code, Section 2.

**NOTICE OF FORFEITURE**  
**31 U.S.C. § 5317(c)(1)(A); 28 U.S.C. 2461(c)**

Pursuant to Title 31, United States Code, Section 5317(c)(1)(A) and Title 28, United States Code, Section 2461(c), the United States gives notice to defendant,

**SERGIO SOSA**

that in the event of conviction for an offense charged in Counts 1 or 2, the United States intends to seek forfeiture of all property, real or personal, involved in the offense and any property traceable thereto, as provided by Title 31, United States Code, Section 5317(c)(1)(A). The property to be forfeited includes, but is not limited to, approximately \$500,000 in United States Currency and the following:

**Any and all interest in all of Lot 32, Villas San Gabriel, an addition to the City of Mission, Hidalgo County, Texas, as per map or plat recorded under Document Number 2458410, Map Records of Hidalgo County, Texas;**

that in the event of conviction for an offense charged in Counts 3 or 4, the United States intends to seek forfeiture of all property, real or personal, involved in the offense and any property traceable thereto, as provided by Title 31, United States Code, Section 5317(c)(1)(A). The property to be forfeited includes, but is not limited to, approximately \$500,000 in United States

Currency and the following:

**All of Lot 40, Villas San Gabriel, an addition to the City of Mission, Hidalgo County, Texas, according to the map filed October 23, 2013 under Document Number 2013-2458410 in the Office of the County Clerk of Hidalgo County, Texas;**

that in the event of conviction for an offense charged in Counts 5 or 6, the United States intends to seek forfeiture of all property, real or personal, involved in the offense and any property traceable thereto, as provided by Title 31, United States Code, Section 5317(c)(1)(A). The property to be forfeited includes, but is not limited to, approximately \$329,000 in United States

Currency and the following:

**Any and all interest in all of Lot 64, Silver Creek Estates, an addition to the City of McAllen, Hidalgo County, Texas, as per map or plat recorded under Clerk's File Number 2933689, Map Records of Hidalgo County, Texas;**

**Money Judgment**

Defendant is notified that upon conviction, a monetary judgment may be imposed equal to the total value of the property subject to forfeiture.

**Substitute Assets**

Defendant is notified that in the event that property subject to forfeiture, as a result of any act or omission of defendant,

- (A) cannot be located upon the exercise of due diligence;
- (B) has been transferred or sold to, or deposited with, a third party;
- (C) has been placed beyond the jurisdiction of the court;
- (D) has been substantially diminished in value; or

(E) has been commingled with other property that cannot be divided without difficulty, it is the intent of the United States to seek forfeiture of any other property of the defendant up to the total value of such property pursuant to Title 21, United States Code, Section 853(p), incorporated by reference in Title 28, United States Code, Section 2461(c).

A TRUE BILL

  
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FOREPERSON

RYAN K. PATRICK  
UNITED STATES ATTORNEY

  
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ASSISTANT UNITED STATES ATTORNEY